Jane G. Kearl (CA 156560)	
WATT, TIEDER, HOFFAR & FITZGERALD, L.	L.P.
Irvine, CA 92614	
Facsimile: 949-261-0771	
cholley@watttieder.com	
Attorneys for Creditor Barnard Pipeline, Inc.	
	RANKBIIPTCV COURT
0.111111	TRICT OF CALIFORNIA
SAN FRAN	CISCO DIVISION
In re:	Bankruptcy Case
PG&E CORPORATION,	Case No. 19-30088 (DM) Chapter 11
-and-	(Lead Case) (Jointly Administered)
PACIFIC GAS AND ELECTRIC COMPANY,	(,
Debtors.	
☐ Affects PG&E Corporation	NOTICE OF CONTINUED PERFECTION OF MECHANICS LIEN PURSUANT TO 11
☐ Affects Pacific Gas and Electric Company	U.S.C. § 546(b)(2)
	Marin County (Lien 2019-0002406)
* All papers shall be filed in the Lead Case, No. 19-30088 (DM)	
110. 17 30000 (2012)	
Barnard Pipeline, Inc. ("Barnard"), b	y and through its undersigned counsel, hereby gives
notice of continued perfection of its mechanic	cs lien under 11 U.S.C. § 546(b)(2), as follows:
1. Barnard has provided and deli	vered labor, services, equipment, and/or materials for
the construction and improvements of projec	ts located in the County of Marin, State of California
(the "Property"), the legal description for wh	ich is set forth in the Claim of Mechanics Lien, a true
copy of which is attached hereto as Exhibit A	A (the "Mechanics Lien").
2. The Property is owned by F	PG&E Corporation and/or Pacific Gas and Electric
Company (collectively, the "Debtors"), which	h filed voluntary petitions for relief under Chapter 11
	Colin C. Holley (CA 191999) WATT, TIEDER, HOFFAR & FITZGERALD, L. 2040 Main Street, Suite 300 Irvine, CA 92614 Telephone: 949-852-6700 Facsimile: 949-261-0771 Email: jkearl@watttieder.com cholley@watttieder.com Attorneys for Creditor Barnard Pipeline, Inc. UNITED STATES NORTHERN DIST SAN FRAN In re: PG&E CORPORATION, -and- PACIFIC GAS AND ELECTRIC COMPANY, Debtors. Affects PG&E Corporation Affects Pacific Gas and Electric Company Affects both Debtors * All papers shall be filed in the Lead Case, No. 19-30088 (DM) Barnard Pipeline, Inc. ("Barnard"), b notice of continued perfection of its mechanic Barnard has provided and deli the construction and improvements of projec (the "Property"), the legal description for wh copy of which is attached hereto as Exhibit A 2. The Property is owned by F

of Title 11 of the United States Code (the "Bankruptcy Code") on January 29, 2019 (the "Petition Date").

- 3. On January 25, 2019, before the Petition Date, Barnard properly and timely recorded its Mechanics Lien under California Civil Code § 8400, et seq. in the Official Records of Marin County, State of California.
- Through January 25, 2019, the amount owing to Barnard subject to its Mechanics 4. Lien is at least \$17,230,39, exclusive of accruing interest and other charges, and additional amounts which have continued and are continuing, to accrue after the Petition Date.
 - 5. California Civil Code § 8460(a) provides that:

The claimant shall commence an action to enforce a lien within 90 days after recordation of the claim of lien. If the claimant does not commence an action to enforce the lien within that time, the claim of lien expires and is unenforceable[.]

- Pursuant to California Civil Code § 8460, an action to enforce a lien must be 6. commenced within 90 days after recordation of the claim of lien. However, section 362 of the Bankruptcy Code automatically stays Barnard from filing a state court action to enforce its mechanics lien. See 11 U.S.C. § 362.
 - 7. Section 546(b)(2) of the Bankruptcy Code provides that when applicable law

... requires seizure of such property or commencement of an action to accomplish such perfection, or maintenance or continuation of perfection of an interest in property; and ... such property has not been seized or such an action has not been commenced before the date of the filing of the petition; such interest in such property shall be perfected, or perfection of such interest shall be maintained or continued, by giving notice within the time fixed by such law for such seizure or such commencement.

See 11 U.S.C. § 362; see also Village Nurseries v. Gould (In re Baldwin Builders), 232 B.R. 406, 410-11 (9th Cir. 1999); Village Nurseries v. Greenbaum, 101 Cal.App.4th 26, 41 (Cal. Ct. App. 2002).

8. Accordingly, Barnard hereby provides notice of its rights as a lienholder in the Property pursuant to California's mechanics lien law. Barnard is filing and serving this notice to perfect, preserve, maintain, and continue the perfection of its lien and its rights in the Property to

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comply with the requirements of California state law, 11 U.S.C. §§ 362(a), 362(b)(3), and 546(b)(2), and any other applicable law. This notice constitutes the legal equivalent of having recorded a mechanics lien in the recorder's office for the county where the Property is located and then having commenced an action to foreclose the lien in the proper court. By this notice, the Debtors and other parties in interest are estopped from claiming that the lawsuit to enforce Barnard's mechanics lien was not timely commenced pursuant to applicable state law. Barnard intends to enforce its lien rights to the fullest extent permitted by applicable law. The interests, perfected, maintained, or continued by 11 U.S.C. § 546(b)(2) extend in and to the proceeds, products, offspring, rents, or profits of the Property.

- 9. The filing of this notice shall not be construed as an admission that such filing is required under the Bankruptcy Code, the California mechanics lien law, or any other applicable law. In addition, Barnard does not make any admission of fact or law, and Barnard asserts that its lien is senior to and effective against entities that may have acquired rights or interests in the Property previously.
- 10. The filing of this notice shall not be deemed to be a waiver of Barnard's right to seek relief from the automatic stay to foreclose its mechanics lien and/or a waiver of any other rights or defenses.
 - 11. Barnard reserves all rights, including the right to amend or supplement this notice.

Dated: April _____, 2019

WATT, TIEDER, HOFFAR & FITZGERALD, L.L.P.

By:

Jane G. Kearl (CA 156560) Colin C. Holley (CA 191999) 2040 Main Street, Suite 300

Irvine, CA 92614

Telephone: 949-852-6700 Facsimile: 949-261-0771

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cholley@watttieder.com

Attorneys for Creditor Barnard Pipeline, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 2019, I caused a copy of the foregoing Notice of Continued Perfection of Mechanics Lien Pursuant to 11 U.S.C. § 546(b)(2) to be sent via e-mail and/or first-class mail to the parties identified in the Master Core/2002 Service List attached hereto as Exhibit B.

Jane G. Kean

WATT, TIEDER, HOFFAR &

FITZGERALD, L. P. P. Ser. 19-30088 Doc# 1398 Filed: 04/15/19 NOTICE OF CONTINUED PERFECTION OF

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WATT, TIEDER, HOFFAR & FITZGERALD, LC. ATTORNEYS AT LAW IRVINE	: 19-30088	Doc# 1398	Filed: 04/15/19 19	NOTICE OF CONTINUED PERFECTION OF Entered: MACLENIA CS 1:154: 26 RSPANE TOOF U.S.C. §

SIM Recording requested by:
Barnard Pipeline, Inc.

And when recorded mail this document to:

Jane G. Kearl, Esq. Robert C. Shaia, Esq. Watt, Tieder, Hoffar & Fitzgerald, LLP 2040 Main Street, Suite 300 Irvine, CA 92614

2019-002406

Recorded
Official Records
County of
Marin
SHELLY SCOTT
Assessor-Recorder
County Clerk

REC FEE 20,00 CONFORMED COPY 0.00 SB2 HOUSING 75.00 DA FRAUD FEE 10,00

01:41 PM 25-Jan-2019

Page 1 of 3

For recorder's use

MECHANICS' LIEN (Cal. Civ. Code § 8416, et seq.)

1. BARNARD PIPELINE, INC. ("Claimant") claims a mechanics lien for the labor, services, equipment and/or materials described in paragraph 2, furnished for a work of improvement on that certain real property located in the City of Novato, County of Marin, State of California, and more particularly described as:

All right, title and interest of Pacific Gas and Electric Company ("PG&E") in all easements and all improvements, structures, and pipelines therein, in or on which Claimant provided labor, services, equipment, and/or materials as set forth in paragraph 2, including pipeline structures and related improvements at APN 160-591-70.

- 2. After deducting all just credits and offsets, the sum of \$17,230.39 together with interest at the rate of 10% per annum from January 22, 2019, is due Claimant for the following: labor, services, equipment and/or materials for high pressure natural gas valve automation and valve replacement including piping, instrumentation, electrical and scada services, and related construction work performed under the Alliance Agreement Contract between Claimant and PG&E and Contract Work Authorization No. 2501623485, or otherwise requested by PG&E.
- 3. Claimant furnished the labor, services, equipment and/or materials at the request of: PG&E.
- 4. The name and address of the owner(s) or reputed owner(s) of the real property is/are: PG&E, 77 Beale Street, 32nd Floor, San Francisco, CA 94105.

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5. Claimant's address is: 701 Gold Avenue, Bozeman, MT 59715.

Dated January ZZ, 2019

BARNARD PIPELINE, INC.

Zach Bowler, Vice President

VERIFICATION

I, Zach Bowler, am the Vice President of Claimant on the foregoing Mechanics Lien and am authorized to make this verification for and on its behalf. I have read the foregoing Mechanics Lien and know the contents of the Mechanics Lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated January ZZ 2019

By: Zech Bowler, Vice President

NOTICE OF MECHANICS LIEN

ATTENTION!

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek a sale of your property in order to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS STATE LICENSE BOARD WEB SITE AT www.cslb.ca.gov.

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PROOF OF SERVICE

I, Julie Benton, declare:

I am employed in the County of Orange, State of California. I am over the age of 18 years and not a party to the within action. My business address is 2040 Main Street, Suite 300, Irvine, California 92614-6232.

On January 23, 2019, I served \square the originals \boxtimes true copies of the following document(s) described as MECHANICS LIEN and NOTICE OF MECHANICS' LIEN on the interested parties in this action, by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Irvine, California addressed as set forth below:

Pacific Gas & Electric Company (PG&E) 77 Beale Street, 32nd Floor San Francisco, CA 94105

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 23, 2019, at Irvine, California.

Julie Benton

WATT, TIEDER,
HOFFAR &
FITZGERALD, L.L.P.
ATTORNEYS AT LAW

PROOF OF SERVICE

TAVIN Case: 19-30088 Doc# 1398 Filed: 04/15/19 Entered: 04/15/19 11:34:26 Page 8 of

		Attn: E. Elliot Adler, Geoffrey E. Marr, Brittany S. Zummer	402 West Broadway	Suite 860	San Diego		92101	619-531-8700	619-342-9600	gemart59@hotmall.com btummer@TheAdlerFirm.com
		Attn: Ron A. Symm	10000 Ming Avenue		Bakersfield	3	93311	661-665-5791		RASутт@аегаепег <u>ку.сот</u>
		Attn: EVELINA GENTRY	300		Los Angeles	5	12006	213-688-9500	213-627-6342	evelina gentry@akerman.com
		Attn: JOHN E. MITCHELL and YELENA ARCHIYAN	2001 Ross Avenue, Suite 3600		Dallas	¥	75201	214-720-4300	214-981-9339	john mitchell@akerman.com
Akin Gump Strauss Hauer & Feld LLP	۵.	Attn: Ashley Vinson Crawford	580 California Street	Suite 1500	San Francisco	8	94104	415-765-9500	415-765-9501	avcrawford@akingump.com
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		Attn: Michael S. Stamer, Ira S.	-		Mossi Vork	λN	10036	212-872-1000	212-872-1002	idzengoff@akingump.com dbotter@akingump.com
Akin Gump Strauss Hauer & Feld LLP		Ditengolf, David H. Botter Attn: Anne Andrews, Sean T. Higgins,	Une bryant Park		100	5	03660	949-748-1000	949-315-3540	shiggins@andrewsthornton.com ct@andrewsthornton.com aa@andrewsthornton.com
		and John C. Thornton Attn: Andrew I. Silfen, Beth M.		Suite 300	Newbork beach	5 }	10019	212.484.3900	212-484-3990	Andrew.Silfen@arentfox.com Beth.Brownstein@arentfox.com Jordana.Renert@arentfox.com
		Brownstein, Jordana L. Renert Attn: Andy S. Kong and Christopher K.S.		4200 F100F	Mew 10th		90013-1065	213-629-7400	213-629-7401	andy.kong@arentfox.com christopher.wong@arentfox.com
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3		Attn: Aram Ordubegan Attn: Brian Lohan, Esq., Steven	SSS West rillin saleet	100	7	2	91001	212-836-8000	212-836-8689	brian.lohan@amoldporter.com steven.fruchter@amoldporter.com
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		Attn: XAVIER BECERRA, DANETTE	455 Golden Gate Avenue	Suite 11000	San Francisco	5	94102-7004	415-510-3367	415-703-5480	
Attorney General of California		Attn: XAVIER BECERRA, MARGARITA	1515 Clav Street, 20th Floor	P.O. Box 70550	Oakland	ð	94612-0550	510-879-0815	\$10-622-2270	Margarita.Padilla@dol.ca.gov
Attorney Sensors of California		Attn: XAVIER BECERRA, MARGARITA	300 South Spring Street	Suite 1702	Los Angeles	গ	90013	213-269-6326	213-897-2802	James Potter@doj.ca.gov
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		Attn: Eric E. Sagerman, Lauren T. Attard 11	11601 Wilshire Blvd.	Suite 1400	Los Angeles	3	90025-0509	310-442-8875	310-820-8859	
		Attn: Robert A. Julian. Cecily A. Dumas	1160 Battery Street	Suite 100	San Francisco	5	94111	415-542-8730		cdumas@bakerlaw.com
		Attn: C. Luckey McDowell, Ian E. Roberts Kevin Chiu	8	Suite 1000	Dallas	ř	75201	214-953-6500		lan, Roberts@BakerBotts.com Kevin, Chiu@BakerBotts.com
		Attn: Navi C Dhillon	101 California Street	Suite 3600	San Francisco	5	94111	415-291-6200		Navi.Dhillon@BakerBotts.com
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		Attn: Craig Solomon Ganz, Michael S.	1 Fast Washington Street	Suite 2300	Phaenix	AZ	85004-2555			_
		Attn: Matthew G. Summers	919 North Market Street	1	Wilmington	30	19801	302-252-4428	410-361-8930	tohe month bed by the com
		Attn: John McCusker	Mail Code: NY1-100-21-01	One Bryant Park	New York	W	10036	+0+7-CC9-0+0		ssummy@baronbudd.com
		Attn: Scott Summy, John Fiske	3102 Oak Lawn Avenue #1100		Dallas	ř	75219	214-521-3605		ifiske@baronbudd.com truccurin@bkolaw.com
		Attn: Terry L. Higham, Thomas E.	350 South Grand Avenue,		Los Angeles	ర	90071-3485	213-621-4000	213-625-1832	
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COPLAN	& ARONOFF	BENESCH, FRIEDLANDER, COPLAN & ARONOFF Attn: Kevín M. Capuzzi, Michael J.	222 Delaware Avenue	Suite 801	Wilmington	DE	19801	302-442-7010	302-442-7012	-
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Berger Kahn, a Law Corporation		Attn. Craig S. Simon	A Park Place, Suite 340		H VIII		The second secon			To the stoingraphy com

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Attn: Michael W. Malter, Robert G. Harris, Heinz Binder		Attn: Mark Gorton Attn: Alan R. Brayton, Esq. and Bryn G.		Attn: Mark V. Isola		Attn: Gregory A. Roogeau Attn: Valerie Bantner Peo. Shawn M.		. Aguilar	Attn: Melanie Cruz, M. Armstrong			Attn: Michael W. Goodin	Schlerberd	Department of Labor and Industry	Awn Dokes C Califana	Attn: Dario de Ghetaldi, Amanda L.	Riddle, Steven M. Berki, Sumble Manzoor	Attn: Frank M. Pitre, Alison E. Cordova,		1	Attn: Eric May Attn: Mark D. Plevin. Brendan V.		onione D. Almv		igel	Attn: Michael S. Danko, Kristine K. Meredith, Shawn R. Miller	Attn: Andrew D. Yaphe	Attn: Eli J. Vonnegut, David Schiff,	Attn: Karl Knight	Attn: Bryan E. Bates, Esq.			ALCH LEGICE MELSOON
BINDER & MALTER, ILP		Boutin Jones Inc.	BRAYTON-PURCELL LLP	Brothers Smith LLP		Brunetti Rougeau LLP	Buchalter A Professional Corporation		CHEVRON PRODUCTS COMPANY, A DIVISION OF CHEVRON ILS A INC.			Clausen Miller P.C.	Cleary Gottlieb Sheen & Hamilton LLP	Commonwealth of Pennsylvania	0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	coper, write a cooper to	COREY LUZAICH DE GHETALDI & RIDDLE LLP	Grand Branch B.	Cotchett, Pitte & Miccaruly, Ltr	County of Sonoma	COUNTY OF YOLD	Crowell & Moring LLP	Youngil & Moning 119	Crowell & Moring LLP	Crowell & Moring LLP	DANKO MEREDITH	Davis Polk & Wardwell LLP		Dates Fork & Watewell LLP	Dentons US LLP	Darbone US 11 D	and a second	Dentons US LLP
Counsel (MChargePoint, Inc., Counsel to Almendariz ConsultinDnc.	nd Partγ-in-Interest Sonoma	Clean Power Authority Counsel Consecured asbestos personal injury		Directional	ses, Inc. dba Kortick	Manufaction Company	_	1	Counsel Lathevron Products Company, a division of CH	lifornia Community Choice	B	Bermuda-Limited, Ashford Inc., Ashford Hospitality Ci	Counsel (m. BlueMountain Capital Management, LLC		Course Langowan Construction Company Inc., Calmera Celephone Company, Kerman Telephone Co., Pinnicies Telephone Co., The Ponderosa Mediomero, Sierra Telephone Company, Inc.,			ommittee appointed by the North Bay Fire stion Proceeding terms of the Court's	Case Management Order No. 1		Counsel for Valley Clean Energy Alliance	Renaissance Reinsurance LTD.		Course to Renaissance Reinsurance LTD.			'n	ider the Debtors' proposed ancing facilities, Counsel for strative Agent for the Utility	Revolving Credit Facility Creditor and Councel to Debra Grassgreen		ion and Halkirk I		Halkirk I Wind Project LP

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	011 311 100	Fig.		Suite 2500	Los Angeles	5	90017-5704	213-623-9300	213-623-9924	samuel mattelgodentons.com
T	Dentons Us LLP	· hea	100 West San Fernando	Suite 555		ð	95113	408-971-6270	408-971-6271	kdiemer@diemenwei.com
Counsel for ad Hoc Group of Subrogation Calm	Diemer & Wei, LL			2000 ASTO					000000000000000000000000000000000000000	david.nley@dlapiper.com
	DLA PIPER LLP (US)	Artn: Eric Goldberg, David Riley	2000 Avenue of the Stars	Suite 400 North Tower Los Angeles	Los Angeles	e l	90067-4704	310-585-3000	000000000000000000000000000000000000000	
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NAME	Taylor Enellsh Duma LLP	Ü	Dany			TOO IMAN SANDERS LLF	TROUTMAN SANDERS LLP		THEN - The Hillin Reform Network	rict of CA			Civil Division		U.S. Department of Justice, Civil Division	U.S. Nuclear Regulatory Commission	U.S. Nuclear Regulatory Commission	United States Department of Justice Civil	United States Department of Justice Civil	Division	S Securities and Exchange Commission	US Securities and Exchange Commission	WAGSTAFFE, VON LOEWENFELDT, BUSCH & RADWICK. ILP		Walkup Melodia Kelly & Schoenberger Walter Wilhelm Law Group a Professional	Corporation	Weil, Gotshal & Manges LLP	Mainheim Brase & Beenfald	White & Case LLP	0	White & Case LLV	White & Case LLP Williams Kastner	
DESCRIPTION	Counsel fa BrightView Enterprise Solutions (AR, Counsel for Granite Construction Incornor (AR, BrightView Landcrape Services, Inc. 17av		Expert Company		Counsel Reconsolidated Edison Development Inc.,			Counsel for Consolidated Edison Development Inc. Tro			e Federal	ited States on behalf of	cisi		Counsel Ofederal Energy Regulatory Commission U.S.		ory Commission		Counsel Orthe United States of America, Department Un	\neg	US Securities and Exchange Commission		Association	Liffs Executive Committee appointed by pperior Court in the North Bay Fire council Coordination Proceeding Pursuant to the terms of the Court's	Case Management Order No. 1 Counsel Cardena Energy LLC, Midway Sunset W?	npany	Counsel to bettor	nd Scientists of TE, Counsel for SEIU United	Course (Mod Sempra Energy, San Diego Gas & Electric Company and Southern California Gas Company W	tric	tric		, <u>e</u>

In re: PG&E Corporation,
Master Service List
Case No. 19,30088

Californ of difficiency - Demand Management Council, Californ of difficiency - Demand Management Council, Counce(MC Cypress Energy Partners, L.P., Tulsa Inspection Mesourges, L.C., Cutt, Tulsa Inspection Management, L.C., and Cypress (Garyy Management - Tile, L.C., Counsel for Peninsul, Quen Energy, Authority.	Winston & Strawn LIP	Attn: David Nejer	200 Park Avenue		New York	N.	10166-4193	.212-294-6700	212-294-4700	212-294-4700 dneler@winston.com
Counce (Lo California Fiftidency + Demand Amage Canton Council, Counsel for Cypress Energy Partners, D., Tulea Inspection Resources - PUC, LLC, Tulea Inspection Resources, LLC, CF Inspection That Inspection Resources, LLC, This Programment - The Canton Council for Peninsula Gean Energy Authority WINSTON & STRAWN LLP	WINSTON & STRAWN LLP	Attn: Justin E. Rawlins	333 S. Grand Avenue	38th Floor	Los Angeles	5	90071-1543	213-615-1700	213-615-1750	213-615-1750 jrawins@winston.com
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